

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

In re:	§	CHAPTER 11
	§	
TFRC ENTERPRISES LLC	§	CASE NO. 23-60006
<i>Debtor</i>	§	

FRANK SHAW’S JOINDER IN RECEIVER’S EMERGENCY MOTION TO DISMISS
[relates to Docs. 1 and 5]

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Creditor Frank Shaw adopts and joins the State Court-Appointed Receiver’s Emergency Motion to Dismiss Unauthorized Petition [Doc. 5] filed by Seth Kretzer (“Receiver”), as state-court appointed receiver over Richard J. Whitmore, II. Mr. Shaw incorporates by reference as if fully set forth herein the entirety of the Receiver’s emergency motion.

PRAYER

For cause, Mr. Shaw respectfully asks the Court to consider the Receiver's motion to dismiss on an emergency basis and, after a hearing, to order dismissal of the Chapter 11 petition filed by Richard J. Whitmore, II in the name of TFRC Enterprises LLC on January 27, 2023, as an authorized and bad faith filing.

Mr. Shaw further requests all other relief to which he is entitled.

Respectfully submitted,

POUPORE LAW FIRM PLLC

/s/ Jourdain Poupore
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Attorney for Frank Shaw

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on January 30, 2023, via ECF to all other parties requesting notice.

/s/ Jourdain Poupore
Jourdain Poupore